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US EPA RECORDS CENTER REGION 5



551303

Law Department

Paul M. Renberg
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November 14, 2017

Via Federal Express Mail

Mr. Matthew Moore
Assistant Regional Counsel
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Request for Information
Pursuant to Section 104 (e) of CERCLA
AA Oil Site
2340 South Tibbs Avenue, Indianapolis, Indiana
Spill Site Identification Number: C54L

Dear Mr. Moore:

I write in response to your letter of August 23, 2017 to Dana Incorporated regarding a request for information related to the AA Oil Site in Indianapolis, Indiana. Please find enclosed the answers of Dana Incorporated to the questions asked. The deadline for the response was amended twice by agreement with you to a due date of November 15, 2017.

Please be aware that as a part of the reorganization plan associated with the chapter 11 bankruptcy filing by Dana Corporation and 40 of its affiliates (In re Dana Corporation, et al., Bankruptcy Case 06-10354 [BRL], Dana Corporation was merged into Dana Companies, LLC and was a wholly owned subsidiary of Dana Holding Corporation (now Dana Incorporated). Dana Companies, LLC was sold by Dana Incorporated to Enstar Holdings (US) Inc. on December 30, 2016. Any past liabilities associated with the activities of Dana Corporation may have been discharged as a part of the bankruptcy process.

Please note that in response to this informational request, Dana Incorporated has not found any responsive documents related to the AA Oil site. Dana Incorporated reserves the right to amend the submitted answers to the questions; should we discover any additional responsive material. If you have any further questions related to this request, please feel free to contact me directly.

Sincerely,

Paul M. Renberg
Senior Environmental Counsel /
Senior Director – Dana Environmental Services

Enclosures

QUESTIONS
AA Oil Site
2340 South Tibbs Avenue
Indianapolis, IN
Site Spill Identification Number C54L

1. State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answering any of the questions below on behalf of Dana Incorporated (the Company).

Response:

- a. Paul Matthew Renberg, 3939 Technology Drive, Maumee, Ohio, 43537, 419.887.5138, Environmental Counsel 1999 – 2005, Senior Counsel/ Senior Director 2005 – present. From 1999 to 2008 with Dana Corporation and from 2008 to present Dana Holding Corporation / Dana Incorporated. Dana Holding Corporation was renamed Dana Incorporated on August 1, 2016.
- b. Robert Allen Cole, 2100 West State Blvd., Fort Wayne, IN 46806, 260.494.9764, Environmental Engineer 1987 – 2001, Environmental Health and Safety Engineer, 2002-2006, Regional Environmental Manager, 2006-present. From 1987 to 2008 with Dana Corporation and from 2008 to present Dana Holding Corporation / Dana Incorporated. Dana Holding Corporation was renamed Dana Incorporated on August 1, 2016.
- c. Lisa Wurster, 3939 Technology Drive, Maumee, Ohio, 43537, 419.887.5142, Environmental Counsel 1999 – 2005, Senior Counsel/ Senior Director 2005 – present. From 1999 to 2008 with Dana Corporation and from 2008 to present Dana Holding Corporation / Dana Incorporated. Dana Holding Corporation was renamed Dana Incorporated on August 1, 2016.
- d. Robert William Spencer, Jr., 3939 Technology Drive, Maumee, Ohio, 43537, 419.887.5138, Senior Counsel/ Assistant Secretary 2007 – present. From 2007 to 2008 with Dana Corporation and from 2008 to present Dana Holding Corporation / Dana Incorporated. Dana Holding Corporation was renamed Dana Incorporated on August 1, 2016.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to the questions of this Information Request and provide copies of all such documents.

Response: Initially, the Company, through the individuals listed above, could not identify any connection with the AA Oil Site. Matt Moore from USEPA, then directed the Company to look at Antwerp, OH, and connections with the former Cam-Or Site in Northern Indiana. The Company has not been able to find any records that relate to the Antwerp site. The manufacturing activities at this facility ceased in 2003 and was sold by Dana Corporation to Big Dog Projects, LLC in 2007. At that time, the records were left with the facility. We contacted the former owner of Big Dog (Kirk Hopkins) who replied that he believed all of the records were discarded during a general cleanup of the facility. We then contacted the current owner of Big Dog (Mark Greenwood) who stated he has never seen any files at the site.

Based upon the request of Matt Moore, Dana also looked at the other Dana Corporation facilities connected to the former Cam-Or site in Westfield, IN. They were Auburn, IN, Ft. Wayne, IN and Columbia City, IN. Dana Corporation sold the Auburn facility to Eaton

Corporation in 1997 and could not locate any records relating to this site. Dana Corporation sold the Columbia City facility to CF Gomma in 1997 and could not locate any records relating to this site. We reviewed files from the Ft. Wayne facility, which is still owned and operated by the Company. Based upon a review of the environmental files of the current Company facility in Ft. Wayne, Indiana - no documents were found which reference the Site.

With regards to the former Cam-Or site, the Company has located five waste manifests that show disposal at two Westfield Oil/Cam-OR locations in Westfield and Portage, IN. (See Included CD) The Company also reviewed the SPC- 17 Liquid Waste Removal Reports (from 1977 to 1987). (See included CD). To be clear, while the Company has included the information related to the Cam-Or site as evidence of the breadth of our search for information, this material is not relevant to this 104 (e) request for the Site.

3. Identify the Company's policy with respect to document retention.

Response: The Company has a comprehensive document retention guidance document. (See Attachment 1)

4. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question of this Information Request or who may be able to provide additional responsive documents, identify such persons.

Response: Beyond the individuals mentioned above, the Company does not have knowledge of additional individuals with respect to this question #4.

5. Explain the Company's present operational status. For example, an operational status may be active, suspended, defunct, merged, or dissolved.

Response: Dana Incorporated (formerly Dana Holding Corporation until July 31, 2016) (Dana) is currently active. As a result of the emergence of Dana Corporation (Prior Dana) from operating under Chapter 11 of the United States Bankruptcy Code (the Bankruptcy Code) on January 31, 2008 (the Effective Date), Dana is the successor registrant to Prior Dana pursuant to Rule 12g-3 under the Securities Exchange Act of 1934. Prior Dana and forty of its wholly-owned subsidiaries (collectively, the Debtors) operated their businesses as debtors in possession under Chapter 11 of the Bankruptcy Code from March 3, 2006 (the Filing Date) until emergence from bankruptcy on January 31, 2008. The Debtors' Chapter 11 cases (collectively, the Bankruptcy Cases) were consolidated in the United States Bankruptcy Court for the Southern District of New York (the Bankruptcy Court) under the caption In re Dana Corporation, et al., Case No. 06-10354 (BRL). Pursuant to Plan of Reorganization and Confirmation Order, as of the Effective Date, Old Dana Holdco (n/k/a Dana Companies, LLC) was newly formed, and Dana Holding Corporation was newly formed as the holding company for, among other entities, the reorganized Debtors and succeeded to the assets of the Debtors free and clear of all Claims (as defined in the Plan) and interests.

Dana Holding Corporation was renamed Dana Incorporated on August 1, 2016. Dana Incorporated's membership interest in Dana Companies, LLC the successor by merger at the emergence to Dana Corporation, was subsequently sold to Enstar Holdings (US) Inc. on December 30, 2016.

6. Provide the date the Company was incorporated, formed, or organized. Identify the state in which the Company was incorporated, formed, or organized.

Response: Dana Incorporated was incorporated in Delaware on December 7, 2007.

7. Identify the business structure, for example, sole proprietorship, general partnership, limited partnership, joint venture, or corporation, under which the Company currently exists or operates and identify all former business structures under which it existed or operated since its inception.

Response: Dana Incorporated is a corporation.

8. Describe the nature of your business.

Response: Dana Incorporated is a Global manufacturer of high technology driveline (axles, driveshafts and transmissions), sealing and thermal-management products

In addition:

- a. Describe the raw materials and the manufacturing processes utilized by your company and the products of your manufacturing process.

Response: Without knowing what facility to reference, this request is too voluminous to be able to respond to in a meaningful fashion.

- b. If the nature of your business has changed significantly since 1980, please describe the nature of your business presently and prior to 1980.

Response: The Company was formed in 2007. In general, the nature of the Company's business has not changed significantly in the past 10 years.

9. Provide the dates that the Company, under any of its current or former business structures, generated or arranged for the transportation of waste to the Site.

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any dates requested.

10. Provide a complete list of employees who had knowledge of the generation, transport and disposal of wastes at the Site during any or all of the period of time that the Company generated or arranged for the transportation of waste for disposal at the Site. For each employee listed, provide the following information:

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 10.

- a. The employee's full name;

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 10.

- b. The employee's current, or last known address and telephone number, including the last known date on which you believe each address, and telephone number was current;

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 10.

- c. The dates that the employee worked with the Site;

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 10.

- d. The position(s) the employee held under any of the Company's business structures; and

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 10.

- e. The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 10.

11. Provide a list of all materials transported or disposed of at the Site, identifying the chemical composition, quantities, and a description of the process by which the material was generated.

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 11.

12. If the Company transported oil to the Site, respond to the following requests:

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 12.

- a. Identify the type(s) of oil(s) transported to the Site.

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 12.

- b. Identify any additives used in the oil(s) transported to the Site.

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 12.

- c. Describe the process by which used or waste oil was generated by Respondent and describe the constituents of such used or waste oil. Provide all documents evidencing the constituents of such used or waste oil.

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 12.

13. Identify and provide the information below for all hazardous wastes that were transported to the Site since the beginning of the Company's involvement at the Site:

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 13.

- a. The trade or brand name, chemical composition, and quantity used for each substance and the Material Safety Data Sheet or Safety Data Sheets for each product;

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 13.

- b. Describe the waste streams generated by operations and equipment with respect to the substances;

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 13.

- c. State the volume and frequency of the transport and disposal of the waste materials to the Site; and

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 13.

- d. Provide copies of all analyses for substances containing hazardous materials performed on the materials prior to disposal at the Site.

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 13.

14. List and provide copies of all federal, state, county, city, and all other local permits, licenses, and/or registrations and their respective permit numbers issued concerning your operations and the storage, use, and discharge of substances, including but not limited to permits, and correspondence related to Publicly Owned Treatment Works (POTW), Marion County permits and licenses, and IDEM permits and licenses. Your response must include all compliance testing results for all waste streams generated in your operations.

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 14. Without knowing what facility to reference, this request is too voluminous to be able to respond to in a meaningful fashion.

15. State whether the Company has or had a permit or permits issued under the Resource Conservation and Recovery Act (RCRA). If the answer is "yes," identify all such permits, including but not limited to the dates of issuance and a general description of the process permitted. Provide copies of all such permits.

Response: The Company has no knowledge of waste being transported to the Site and thus cannot provide any of the information requested in this question # 15. Without knowing what facility to reference, this request is too voluminous to be able to respond to in a meaningful fashion.

16. Provide copies of all correspondence between Dana Incorporated and the Site owners and operators, regarding materials that came to be located at the Site. Include copies of all contracts, agreements, receipts, invoices or other correspondence related to the transfer of materials to the Site.

Response: The Company could not locate any correspondence between The Company and the Site.



OneDana

Contents

Business Unit

Plants

Regions

Corporate

Careers

Ethics

Environmental Services Department Record Retention

Information Classification: Internal Use Site Owner:



Welcome to the Environmental Services Department Record Retention page. Use the search box to search this and other department schedules by keyword. If you have any questions regarding the contents of this page, please direct them to Colleen Sewell at colleen.sewell@dana.com, Records Coordinator for the Environmental Services Department.

ENVIRONMENTAL SERVICES SCHEDULE

Document Category

Required Period

Period Begins

General Environmental Information

ISO 14001 Records

- Environmental aspects
- Objectives and targets
- Roles, responsibilities and authorities
- Competency records
- Training records
- Whether to communicate significant environmental aspects externally
- Calibration/verification records
- Legal Compliance evaluation records
- Other requirements compliance evaluation records
- Corrective and preventive action records
- Management review records

As specified in the ISO 14001 standard or the facility's EMS

When created

Outside agency inspection records

For the life of the facility

When received

Notices of violation (NOVs) and related corrective action records

For the life of the facility

When created or received

Remedial activity documentation

Permanently

When created

Aerial photographs and topo maps

Permanently

When received

Environmental correspondence

5 years

When received

Audit reports

Until updated

When received

Other audit records, e.g., BMP lists, photos, facility and audit info sheets, etc.

Until updated

When received

Environmental contracts or agreements (non-regulatory)

Permanently

When created or received

Air Quality

Air Emissions Permitting

Air permit exemption documentation

Until not applicable

When created

Updated facility air emissions inventories

Until updated

When created

Registration status documentation

Until updated or not applicable

When created

Air permit application or renewal application and related worksheets

Until not applicable

When created

Air emissions permits (Title V, FESOP, conditional major, synthetic minor, minor source, etc.)

Until renewed, terminated or not applicable

When received

Permit-required documentation, i.e., hours of operation logs, process throughput data, maintenance/ repair records, etc.

As specified in the permit or for the duration of the permit, whichever is longer

When created

Retention of the records will be as long as
longer

Quarterly summaries of continuous emission monitoring	3 years	When created
Malfunction documentation	5 Years	When created
Performance test records	5 years	When created

Refrigerant Recycling and Emissions Reduction (40 CFR 82 Subpart F)

Technician certificates	Until renewed	When received
Refrigerant inventories	Until updated	When created
Records of the amount of refrigerant added (for appliances that contain 50 lbs or more of refrigerant)	3 years	When created
Service records (for appliances that contain 50 lbs or more of refrigerant)	3 years	When created
Reports of why more than 30 days are needed to complete repairs (if applicable)	3 years	When submitted
Leak repair plans (if applicable)	3 years	When created
Follow-up verification test records (if applicable)	3 years	When created
Leak rate records and repair records (if applicable)	3 years	When created
Notifications to EPA (if applicable)	3 years	When submitted
Records to support the amount of refrigerant sent for destruction (if applicable)	3 years	When created
Full charge determination records (if applicable)	3 years	When created

NESHAPs for All Source Categories (40 CFR 63 Subpart A)

Records documenting the occurrence and duration of each startup or shutdown that results in exceeding an emission limit	5 years	When created
Records documenting the occurrence and duration of each malfunction of operation or air pollution control or monitoring equipment	5 years	When created
Records of maintenance on air pollution control and monitoring equipment	5 years	When created
Records documenting the actions taken during startup or shutdown when emission limits were exceeded and when actions differed from the startup, shutdown and malfunction plan	5 years	When created
Records documenting the actions taken during malfunctions when the actions differed from the startup, shutdown and malfunction plan	5 years	When created
Information needed to demonstrate conformance with the source's startup, shutdown and malfunction plan	5 years	When created
Records documenting the periods when a continuous monitoring system (CMS) is malfunctioning or inoperative	5 years	When created
Measurements to demonstrate compliance with a relevant standard	5 years	When created
Results of performance tests, CMS performance evaluations, and opacity and visible emission observations	5 years	When created
Measurements as needed to determine the conditions of performance tests and evaluations	5 years	When created
CMS calibration checks	5 years	When created
Adjustments and maintenance performed on CMS	5 years	When created
Information demonstrating if a source is meeting the requirements for a waiver of recordkeeping or reporting requirements (if the source was granted a waiver)	5 years	When created
Emission levels related to obtaining permission to use an alternative to the relative accuracy test (if the source was granted such permission)	5 years	When created
Supporting documentation for initial and compliance status notifications	5 years	When created
Applicability exemptions from NESHAP standard requirements for facilities with covered operations, but where exemptions or exclusions apply	5 years	When created

NESHAPs for Surface Coating of Miscellaneous Metal Parts & Products (40 CFR 63 Subpart M)

See also "NESHAPs for All Source Categories"

Notifications, reports and related data/calculations	5 years	When created
Information provided by coating manufacturers and/or suppliers regarding hazardous air pollutant (HAP) content and density	5 years	When received
Coating operations records	5 years	When created
Coating use records	5 years	When created
Mass fraction of organic HAP records (if applicable)	5 years	When created

Volume fraction of coating solids records (if applicable)	5 years	When created
Emission rate records (if applicable)	5 years	When created
Records on treatment, storage and disposal facilities (TSDFs) that dispose of waste materials	5 years	When created
Deviation records	5 years	When created

NESHAPs for Reinforced Plastic Composites Production 40 CFR 63 CFR Subpart WWWW)

See also "NESHAPS for All Source Categories"

Add-on control device records (if applicable)	5 years	When received
Organic HAP emission factors and HAP content records	5 years	When created
Certification statements	5 years	When created
Lamination/casting operation records (if applicable)	5 years	When created
Permitting authority approvals for emission equations and factors (if applicable)	5 years	When received

NESHAPs for Stationary Reciprocating Internal Combustion Engines (RICE) (40 CFR 63 Subpart ZZZZ)

See also "NESHAPS for All Source Categories"

Notifications, reports and related data/calculations	5 years	When created
Records of oil changes, belt inspections and filter inspections	5 years	When created
Daily fuel usage records (if applicable)	5 years	When created
Hours of operation records for the stationary RICE	5 years	When created

NESHAPs for Gas Dispensing Facilities (40 CFR 63 Subpart CCCCCC)

See also "NESHAPS for All Source Categories"

Test records	5 years	When created
Vapor tightness testing records for gasoline cargo tanks (if applicable)	5 years	When created
Results of volumetric efficiency/performance tests	5 years	When created

NESHAPs for Industrial, Commercial and Institutional Boilers (40 CFR 63 Subpart JJJJJJ)

See also "NESHAPS for All Source Categories"

Records to document conformance with the work practices, emission reduction measures, and management practices	5 years	When created
Calculations and supporting documentation for demonstrations of compliance with mercury emissions limits (if applicable)	5 years	When created
Inspection and monitoring data	5 years	When created
Bag leak detection system records (if applicable)	5 years	When created

NESHAPs for Plating & Polishing Operations (40 CFR 63 Subpart WWWWWW)

See also "NESHAPS for All Source Categories"

Records to show continuous compliance with each management practice and equipment standard that applies	5 years	When created
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Asbestos

Results of facility asbestos materials surveys	Permanently	When created
Asbestos assessment/removal contracts	Permanently	When created
Notifications related to renovation or demolition of asbestos containing building or areas	Permanently	When created
Records documenting the renovation or demolition of asbestos-containing building or areas, including disposal records	Permanently	When created or received
Written asbestos O&M programs	Permanently	When created
Asbestos O&M inspection records	Permanently	When created
Operating permits	Until renewed, terminated or not applicable	When received
Opacity records/charts	1 year	When created
Sulfur content sampling reports for fuel oil	1 year	When created or received

Boiler Records

Daily boiler records	2 years	When created
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Record	Retention	When created or received
Records of boiler operation inspections	3 years	When created
Water Quality		
NPDES Process Wastewater Discharges		
NPDES process discharge permit exemption records	Until not applicable	When created
NPDES process discharge permits	Until renewed, terminated or not applicable	When received
NPDES permit applications or renewal applications and related worksheets	For the duration of the permit	When created
Sludge disposal permits	Until renewed, terminated or not applicable	When received
Wastewater treatment operator certifications	Until renewed or not applicable	When received
Laboratory results of wastewater analyses	For the duration of the permit	When created or received
Discharge monitoring reports	3 years	When created
Designation of signature authority records	Until updated or not applicable	When created
NPDES permit non-compliance notifications	3 years	When created
Records of chemical agents used in cooling towers	3 years	When created
Permit termination records	3 years	When submitted
NPDES Stormwater Discharges		
NPDES stormwater discharge permits	Until renewed, terminated or not applicable	When received
Permit renewal applications or NOI and related worksheets	For the duration of the permit	When created
Written stormwater pollution prevention plans	Until updated or not applicable	When created
Signature authority designations for signing the stormwater plan	Until updated or not applicable	When created
Stormwater discharge monitoring test results	As specified in permit or for the duration of the permit, whichever is longer	When created
Inspection records as identified in the stormwater plan	As specified in permit or for the duration of the permit, whichever is longer	When created
Records documenting maintenance of control equipment	As specified in permit or for the duration of the permit, whichever is longer	When created
Records of analytical testing of stormwater discharges	As specified in permit or for the duration of the permit, whichever is longer	When created or received
Annual comprehensive site evaluation checklists and resulting reports	As specified in permit or for the duration of the permit, whichever is longer	When created
Pollution prevention team and other employee training records	As specified in permit or for the duration of the permit, whichever is longer	When created
No Exposure Certification		
No exposure certification statements	Until renewed or not applicable	When created
Process Wastewater Discharges to the POTW		
Documented exemptions from publicly owned treatment works (POTW) requirements	Until not applicable	When created
Facility industrial categorical standard determinations	3 years	When created
POTW permit applications or renewal applications and related worksheets	For the duration of the permit	When created
POTW permits	Until renewed, terminated or not applicable	When received
Baseline monitoring reports for discharges to POTWs	3 years	When submitted
Laboratory wastewater discharge analytical data	3 years	When received
Discharge monitoring reports (DMRs)	As specified in the permit or for the duration of the permit, whichever is longer	When created
Signature authority designations for signing DMRs	Until updated	When created
Wastewater treatment operator certifications	Until renewed or not applicable	When received
Toxic organic management plans	Until updated or not applicable	When created

POTW permit noncompliance notifications, i.e., noncompliance with discharge limits, slug loading, excursions, by-passes, etc.	3 years	When created
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Oil Pollution Prevention - SPCC Program

SPCC plans	Until updated or not applicable	When created
Oil discharge reports and spill notifications	For the life of the facility	When created
Inspection records of oil spill sources	3 years	When created
Records that document rainwater discharges from dikes	3 years	When created
Records of oil storage system maintenance and repair	3 years	When created
Tank integrity test records	For the life of the tank	When created or received
Employee training records	3 years	When created

Groundwater Management

Biannual water withdrawal reports	5 years	When created
Groundwater appropriation permits	Until renewed, terminated or not applicable	When received
Potable water analytical test results' reports	For the life of the facility	When created
Potable water quality violations and corrective action reports	For the life of the facility	When created
Records of water system maintenance and changes	5 years	When created
Kentucky groundwater protection plans	6 years	When created
Kentucky groundwater inspection records	6 years	When created
Kentucky groundwater training records	6 years	When created

Waste Management

Hazardous Waste (HW)

Notifications of hazardous waste (HW) activity	Until updated	When created
Records of the facility's EPA ID Number	Until renewed, terminated or not applicable	When received
Written waste determinations: analyses, applying knowledge of the waste and/or profiles	For the life of the facility	When created
Manifests and land disposal restriction forms	For the life of the facility	When created or received
DOT emergency response documentation	Until updated or not applicable	When created
Exception reports	3 years	When submitted
Weekly HW container inspection records	3 years	When created
Daily HW tank inspection records	3 years	When created
HW UST cathodic protection inspection records	For the life of the facility	When created
Reports of releases of HWs from USTs	Permanently	When created
HW closure records (plans, approvals, etc.)	10 years	When created
Written documentation for HW tank changes in service	Aboveground - 3 years Underground - for the life of the facility	When created
Emergency, spill, and decontamination equipment testing and maintenance records	3 years	When created
Written agreements with State emergency response (ER) teams, ER contractors, and/or equipment suppliers	Until updated or not applicable	When created
Documentation that emergency responders, police, fire departments, and/or hospitals refused to make arrangements	Until not applicable	When created
HW contingency plans	Until updated or not applicable	When created
Reports of HW spills and incidents to EPA	Permanently	When created
Initial and refresher HW employee training records	3 years	When created
HW employee records: names, job titles, skills, etc.	3 years	Employee's last day of employment at the facility
Biennial reports to EPA and State and supporting documentation	3 years	When submitted
Contracts for transporter services	Permanently	When created
Contracts for disposal services	Permanently	When created
Written waste minimization plans	Until updated or not applicable	When created

Non-Hazardous Waste

Analytical test records	For the life of the facility	When created
Waste disposal records/manifests	Permanently	When created
State-specific special waste disposal permits	Until renewed or not applicable	When received

USEC Oil

Tolling arrangement records	3 years	When created
Transporter notifications and tracking records	3 years	When created

Universal Waste

Large quantity universal waste (UW) handler notifications	Until not applicable	When created
Employee training records	3 Years	When created
Records of UW transported to off-site UW handlers	For the life of the facility	When created
Records of UW received from other locations	For the life of the facility	When created

Underground Storage Tanks

Underground storage tank (UST) registration records	For the life of the tanks	When created
Reports of releases associated with USTs	For the life of the Corporation	When created
Records associated with a UST change-in-service	For the life of the tanks	When created
Financial assurance documentation	For the life of the tanks	When created
Inspection records of cathodic protection on USTs	For the life of the facility	When created
Release detection device manufacturer's instructions, maintenance and service checks	For the life of the tanks	When created
Release detection monthly monitoring records	3 years	When created
Records of UST repairs and subsequent tank tightness test results	For the life of the Corporation	When created
Records of UST closure	Permanently	When created

Emergency Planning and Community Right-to-Know Act (EPCRA) Reporting

Initial emergency planning notifications to the State Emergency Response Commission (SERC)	Until not applicable	When created
Facility contact notifications to the Local Emergency Planning Committee (LEPC)	Until not applicable	When created
MSDS reports	Until not applicable	When created
Chemical inventory (Tier 2) reports and supporting documentation	3 years	Submission deadline
Toxic release inventory (TRI) (Form R or Form A) reports and supporting documentation	3 years	Submission deadline
Supplier notifications and supporting documentation	3 years	When submitted

DOT Requirements

Department of Transportation (DOT) certificates of registration	3 years	When received
Registration statements	3 years	When submitted
Supporting documentation used to prepare the registration statement	3 years	Submission deadline
DOT employee training records	4 years	When created
Safety and security plans	Until updated or not applicable	When created

✚ Add new item